

FILED

MAR - 8 2023

BONNIE HACKLER
Clerk, U.S. District Court

By _____
Deputy Clerk

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHASE LANE ROCHA,

Defendant.

Case No. **CR 23 - 036 RAW**

INDICTMENT

The Federal Grand Jury charges:

COUNT ONE

MURDER IN INDIAN COUNTRY
[18 U.S.C. §§ 1111(a), 1151, & 1153]

On or about January 24, 2023, within the Eastern District of Oklahoma, in Indian Country, the defendant, **CHASE LANE ROCHA**, an Indian, did willfully, deliberately, maliciously, and with premeditation and malice aforethought, unlawfully kill R.A., in violation of Title 18, United States Code, Sections 1111(a), 1151, and 1153.

COUNT TWO

**USE, CARRY, BRANDISH, AND DISCHARGE OF A FIREARM DURING
AND IN RELATION TO A CRIME OF VIOLENCE**
[18 U.S.C. §§ 924(c)(1)(A)(i), (ii), & (iii)]

On or about January 24, 2023, within the Eastern District of Oklahoma, the defendant, **CHASE LANE ROCHA**, did knowingly use, carry, brandish, and discharge a firearm, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, Murder in Indian Country, as charged in Count One of this Indictment, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(i), (ii), and (iii).

COUNT THREE

**CAUSING THE DEATH OF A PERSON IN THE COURSE OF
A VIOLATION OF TITLE 18, UNITED STATES CODE, SECTION 924(c)
[18 U.S.C. § 924(j)(1)]**

On or about January 24, 2023, within the Eastern District of Oklahoma, the defendant, **CHASE LANE ROCHA**, did knowingly use, carry, brandish, and discharge a firearm, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, Murder in Indian Country as charged in Count One of this Indictment, and in the course of this violation caused the death of a person through the use of a firearm, which killing is a murder, as defined in Title 18, United States Code, Section 1111(a), in that the defendant, **CHASE LANE ROCHA**, an Indian, did murder and unlawfully kill R.A., with a firearm, in violation of Title 18, United States Code, Section 924(j)(1).

FORFEITURE ALLEGATION
[18 U.S.C. § 924(d) & 28 U.S.C. § 2461(c)]

The allegations contained in Counts One through Three of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

Upon conviction of the violations charged in Counts One through Three of this Indictment involving violations of Title 18, United States Code, Sections 924(c), 924(j), 1111(a), 1151, and 1153, the defendant, **CHASE LANE ROCHA**, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), all firearms and ammunition involved in the commission of the offenses, including, but not limited to: one (1) Pistolero-brand .357 Magnum revolver.

A TRUE BILL:

Pursuant to the E-Government Act,
the original indictment has been filed
under seal in the Clerk's Office.

CHRISTOPHER J. WILSON
United States Attorney

s / Foreperson
FOREPERSON OF THE GRAND JURY



Patrick M. Flanigan, FL Bar # 47703
Assistant United States Attorney